

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v)
)
DARLENE PACHECO)

CRIMINAL ACTION
NO. 05-10032-PBS

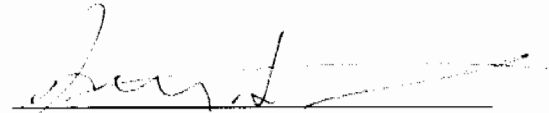
DEFENDANT'S MOTION TO CONTINUE SENTENCING HEARING

Now comes the Defendant, by and through her undersigned counsel, and hereby moves this Honorable Court to extend the sentencing hearing present scheduled for July 13, 2005 at 2:00 p.m. As grounds therefore, Defendant's attorney states as follows:

1. On June 19, 2005, the law offices of Defendant's attorney, James S. Lawrence, Flaherty & Lawrence, at 70 Jefferson Boulevard, Warwick, Rhode Island, sustained catastrophic water damage from a pipe that burst in the offices directly above those of Defendant's Counsel.
2. The said water damage has rendered the office utterly inoperable, and according to disaster recovery specialists managing the clean-up, will remain inoperable for a period of an undetermined number of weeks, and will likely require temporary relocation of its offices.
3. As a result of the averments presented in Paragraphs 1 and 2, *supra*, it would be prejudicial and of great difficulty for Defendant's attorney to prepare and be present at the currently scheduled sentencing hearing.
4. The undersigned has conferred with Adam J. Bookbinder, Esq., United States Attorney's Office, 1 Courthouse Way, Suite 9200, Boston, Massachusetts, who does not oppose a reasonable continuance of the sentencing hearing.

WHEREFORE, Defendant prays that the within motion be granted and that this Honorable Court to extend the sentencing hearing present scheduled for July 13, 2005 at 2:00 p.m. to sometime after September 1, 2005.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on the ^{4th} 25 day of June, 2005, I faxed and mailed a true and accurate copy of the foregoing to:

Adam J. Bookbinder, Esq.
United States Attorney's Office
1 Courthouse Way, Suite 9200
Boston, MA 02210

Tricia Marcy
U.S. Probation Officer
1 Courthouse Way, Suite 1200
Boston, MA 02210

